

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

In re:

Kenneth Willaim Novak, Jr. DBA : Case No.: 11-20744
A-1 Tree Care & Removal : Chapter 13
 : Judge Kent Lindquist

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Deutsche Bank National Trust Company, as
Trustee for Ameriquest Mortgage Securities Inc.,
Asset-Backed Pass-Through Certificates, Series
2001-A, by and through its mortgage servicing
agent Ocwen Loan Servicing, LLC

Name of creditor

Court claim no. (if known)

18

Last four digits of any number you use to identify the debtor's account:

3420

Response to Notice of Final Cure Payment

As contemplated by Fed. R. Bankr. Proc. 3002, Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2001-A, by and through its mortgage servicing agent Ocwen Loan Servicing, LLC, ("Creditor") hereby responds to that certain Notice of Final Cure Payment ("Cure Notice") dated 12/01/15 and filed as Docket No. 281

Pre-Petition Default Payments (applicable option is checked)

Agrees that Debtor(s) has paid in full the amount required to cure the default on Creditor's claim

Disagrees that Debtor(s) has paid in full the amount required to cure the default on Creditor's claim and states that the total amount due to cure pre-petition arrears is:

Post-Petition Default Payments (applicable option is checked)

Agrees that Debtor(s) is current with respect to all payments consistent with § 1322(b)(5) of the Bankruptcy Code.

Disagrees that Debtor(s) is current with respect to all payments consistent with § 1322(b)(5), and states that the total amount due to cure post-petition arrears is:

The amounts due identified on this response may not, due to timing, reflect all payments sent to Creditor as of the date of the Cure Notice. In addition, the amounts due may include payments reflected on the NDC but which have not yet been received and/or processed by Creditor.

Pursuant to Federal Bankruptcy Rule 3002.1(h), within 21 days of the service of this Response, the Trustee and/or the Debtor shall request a hearing to determine whether the Debtor has cured the default and paid all required post-petition amounts.

Sign Here

/s/ Sarah E. Willms Date December 15 , 2015
Signature

Print: Sarah E. Willms (28840-64) Title Attorneys for Creditor
John R. Cummins (11532-10)
Edward H. Cahill (0088985)
Adam B. Hall (0088234)

Company Manley Deas Kochalski LLC

Address P.O. Box 165028
Number Street
Columbus, OH 43216-5028
City State ZIP Code

Contact phone 614-220-5611 Email sew@manleydeas.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Response to Notice of Final Cure was served on the parties listed below via e-mail notification:

Nancy Gargula, One Michiana Square Building, Suite 555, 100 East Wayne Street, South Bend, IN 46601-2349, 574-236-8105

Paul Chael, 401 West 84th Drive, Suite C, Merrillville, IN 46410

Christopher R. Schmidgall, Attorney for Kenneth Willaim Novak, Jr. DBA A-1 Tree Care & Removal, Six W. 73rd Avenue, Merrillville, IN 46410, bankruptcy@garryaweiss.com

and on the below listed parties by regular U.S. mail, postage prepaid on December 15, 2015:

Amanda C. Hires, Attorney for Kenneth Willaim Novak, Jr. DBA A-1 Tree Care & Removal, Six W. 73rd Avenue, Merrillville, IN 46410

Kenneth Willaim Novak, Jr. DBA A-1 Tree Care & Removal, 18007 Holtz Road, Lowell, IN 46356

/s/ Sarah E. Willms
